

**THE PORT AUTHORITY OF NY & NJ**

**Law Department**

*4 World Trade Center  
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November 23, 2020

**VIA Electronic Filing (ECF)**

The Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**Re: *Ahmed Jamal Gaynor v. Port Authority Trans Hudson Corp.*  
Case No. 1:20-cv-02314 (GHW)**

Dear Judge Woods:

I write on behalf of the defendant Port Authority Trans Hudson Corporation in connection with the above-referenced matter to respectfully request a 30-day extension of the defendant's time to submit its expert disclosures. Pursuant to the scheduling order dated July 14, 2020 (ECF Doc. No. 12), the defendant's expert disclosure is due by November 25, 2020. This is the first request for an extension of time.

The reason for the request is the defendant's need for outstanding medical records. Specifically, the defendant's request for medical records from Jersey Medical Center, where the plaintiff first treated in connection with his injuries, was initially not received by the provider, despite having been sent by First Class Mail, and then denied due to a defective HIPPA authorization. The defendant is awaiting a new authorization for these medical records from the plaintiff. Additionally, the defendant is still awaiting medical records relating to the plaintiff's second surgical procedure, which he testified to undergoing in August of this year, as well as radiological studies from the plaintiff's orthopedic provider. I have spoken with the plaintiff's counsel and he consents to this extension.

The proposed alternative date for the defendant to submit its expert disclosure is December 25, 2020. As this request would affect other dates in the scheduling order, a proposed Revised Civil Case Management Plan and Scheduling Order is attached, which proposes extending the remaining dates by 30 days each.

Respectfully submitted,

By: /s/ Brian P. Hodgkinson  
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To: All Counsel of Record (via ECF)